UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

Michael Fenton, et al.,

Court File No. 07-4864 JRT/FLN

Plaintiffs,

JOINT MOTION FOR SETTLEMENT APPROVAL

VS.

Farmers Insurance Exchange,

Defendant.

The Parties hereby move the Court for approval of the Parties' Confidential Settlement Agreement and Release of Claims.

This Motion is based on the Confidential Settlement Agreement and Release of Claims, the Parties' Memorandum of Law, the Affidavit of Timothy C. Selander, and all the files, records and proceedings herein, as well as such oral and documentary evidence as may be presented at the hearing of the Motion.

Dated: October 18, 2011 NICHOLS KASTER, PLLP

s/Timothy C. Selander
Donald H. Nichols, MN Bar No. 78918
Paul J. Lukas, MN Bar No. 22084X
Matthew H. Morgan, MN Bar No. 304657
Reena I. Desai, MN Bar No. 0388311
Timothy C. Selander, MN Bar No. 0387016
4600 IDS Center
80 South Eighth Street
Minneapolis, MN 55402
Telephone (612) 256-3200
Fax (612) 215-6870

ATTORNEYS FOR PLAINTIFFS

Dated: October 18, 2011 SEYFARTH SHAW LLP

s/Andrew M. Paley
George Preonas (Cal. Bar No. 58921)
Andrew M. Paley (Cal. Bar No. 149699)
2029 Century Park East, Suite 3500
Los Angeles, CA 90067
Telephone (310) 277-7200

And

BASSFORD REMELE

Frederick E. Finch 33 South Sixth Street, Suite 3800 Minneapolis, MN 55402-3707 Telephone (612) 333-3000

ATTORNEYS FOR DEFENDANT